

**Proposed Mercury Rules – Revisions to Chapter NR 446**  
**Summary of Comments from Organizations and Business**

NO. & DATE		ORGANIZATION	COMMENTER	COMMENT SUMMARY
1	9/26	Wisconsin Utilities Association (statement provided at the Eau Claire public hearing 9/26)	William Skewes, Executive Director	Support a 10%/40% mercury emission reduction approach.
2	9/27	Laborers' International Union of North America AFL-CIO – Eau Claire	Thomas Gruneth, Business Manager	Concern for coal related jobs and energy costs to consumers if switch to natural gas and oil occurs. Requests levels of mercury reduction that are “more realistic given available technologies.”
3	9/29	Aldo Leopold Audobon Society – Marathon, Portage, Waupaca, and Wood Counties	Thomas Overholt, President	Reduce utility mercury emissions 90% by 2010.
4	10/1	P&H Mining Equipment – Milwaukee (statement provided at Milwaukee public hearing 10/1)	Louise Hermesen, Vice President	Surface coal mining equipment manufacturer concerned about proposed rules affect on products and business costs should electricity rates increase. Rules “leading Wisconsin down the California path.”
5	10/2	Public Service Commission of Wisconsin (statement provided at the Madison public hearing 10/3)	Bie, Mettner and Garvin	PSC urges the NRB to “reject the current proposed rules or direct staff to substantially modify these proposed rules.”
6	10/3	Wisconsin State Public Interest Research Group (statement provided at the Madison public hearing 10/3)	Kerry Schumann, Director	Propose 90% mercury emission reduction by 2007 without trading.
7	10/3	River Alliance of Wisconsin (statement provided at the Madison public hearing 10/3)	Todd Ambs, Executive Director	Support proposed rules, however would like to see trading further restricted or eliminated.
8	10/3	City of Manitowoc (statement provided at the Madison public hearing 10/3)	Mayor Kevin Crawford	Wait for federal MACT. Proposed rules a threat to electric reliability and too costly for consumers. Accept voluntary program from utilities.
9	10/5	Walleyes Unlimited, Inc. USA		Reduce utility mercury emissions 90% by 2010.
10	10/5	Louisiana-Pacific Corporation – Tomahawk	Jon S. Smith, Plant Manager	Consider a voluntary approach.
11	10/5	Red Cliff Band of Lake Superior Chippewas	Leah LaPointe, Lake Superior Protection Coordinator Reggie Cadotte, Integrated Resource Management Plan Coordinator	Reduce utility mercury emissions 90% by 2010. Do not consider a voluntary program.
12	10/5	Packaging Corporation of America – Tomahawk	Kenneth W. Schultz, Mill Manager	Emission cap will be harmful as coal use at facility is projected to increase to accommodate production increases. Expect electricity costs to increase if rules implemented.

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			Support voluntary program.	
13	10/5	Electric Power Research Institute	George R. Offen, Air Emissions/Combustion By-product Management	EPRI documents provided including mercury controls and mercury environmental research.
14	10/8	Wisconsin Laborers’ District Council – Madison	Michael R. Ryan, Business Manager	Oppose rule because of concern that fuel switching will be necessary resulting in the loss of jobs associated with the construction of new coal plants.
15	10/8	Ansul Incorporated – Marinette	Dennis Orszulak, Operations Manager-Standard Products	WPSC forecasts 25% increase in electricity rates for the next fifteen years to implement proposed rules. This would increase product costs. Favor a voluntary program. Ansul converted two boilers from coal to natural gas in 1997.
16	10/8	Burlington Northern Santa Fe Railway for the Wisconsin Rail Committee also including Wisconsin Central Ltd., Canadian Pacific Railway, Union Pacific Railroad.	Brian J. Sweeney, BNSF	Oppose the proposed rules as they will lead to the elimination of coal use in Wisconsin with detrimental impacts to the rail industry.
17	10/10	Wisconsin Green Party	John E. Peck	Reduce utility mercury emissions 90% by 2010. Proposed rules should not allow trading or product collection as compliance options.
18	10/10	Northland Cold Storage, Inc. – Green Bay	David J. Pokel	Concern that proposed rules will increase electricity costs and preclude construction of needed electric generation in the state. Support a voluntary program.
19	10/10	The Ecofeminist Network	Sandra Klippel, Director	Reduce utility mercury emissions 90% by 2010. Proposed rules should not allow trading or product collection as compliance options.
20	10/10	J.J. Keller & Associates, Inc. – Neenah	Jeffrey P. Lau, Corporate Manager – Procurement & Facilities	Concern that proposed rules will increase electricity costs and preclude construction of needed electric generation in the state. Support a voluntary program.
21	10/11	Stratford State Bank - Stratford	A. R. Knol, president	Support a voluntary program.
22	10/12	St. Mary’s Hospital – Green Bay	Bertha Wright, Director of Plant operations	Support a voluntary program.
23	10/12	Electrochemical Products Inc. – New Berlin	Eric Olander	Support a voluntary program.
24	10/12	Green Bay Chamber of Commerce	Patrick J. Schillinger, Vice President of Government affairs and General Counsel	Support a voluntary program.
25	10/14	Environmental Law Society, University of Wisconsin Law School	David Bender, Vice President	Support the proposed rules and identify exposure to vulnerable groups including minorities, children and women, as reason to reduce

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			threat.	
26	10/15	Wisconsin Public Service Corporation	Edward N. Newman, Director – Environmental Services	Proposed rules fail to protect public health and the environment, are not cost effective and reasonable, and interfere with utility ability to meet state energy demand. Included are specific comments relating to the draft environmental assessment and the proposed rules.
27	10/15	Lake Superior Alliance	Bob Olsgard	Supports Wisconsin’s initiative to influence federal MACT with these proposed rules. Rules should require 90% reduction in mercury by 2010.
28	10/15	Dairyland Power Cooperative	Eric Hennen, Director, Environmental Affairs	Opposed to proposed rules on the basis of concerns over impacts on reliability, fuel mix, and costs for existing and future electrical generation. A reduction of 10% in five years and 40% in ten years is appropriate as a bridge to the federal MACT. Includes specific comments, which will be supplemented by October 30 <sup>th</sup> .
29	10/15	Sierra Club Midwest Field Office and John Muir Chapter	Eric Uram and Caryl Terrell	Support a mercury emission reduction goal of 90% by 2010. Trading should be greatly restricted or not allowed. Includes additional specific recommendations.
30	10/15	Forest County Potawatomi Community	Jeffrey Crawford, Attorney General	The proposed rules should also focus on localized mercury deposition sources and offsets should be required of all new sources as soon as the rule becomes effective.
31	10/15	Wisconsin Electric Cooperative Association	David Jenkins	Rule process should be terminated on the basis that the proposal is ” the most expensive, least effective, and least science-based rules ever promulgated by the Department of Natural Resources.”
32	10/15	Wisconsin Paper Council	Edward J. Wilusz, Director, Government Relations	Concerned that the proposed rules provide little environmental benefit, significantly increase electric rates, conflict with federal laws and regulations, do not accommodate historical emission inaccuracies and will restrict economic growth.
33	10/15	Sierra Club Great Waters Group – Milwaukee	Ron Mann	Support a 90% reduction of mercury emissions by 2010.
34	10/15	Citizens’ Utility Board	Steve Hiniker	Supports regulation and will supplement these comments.
35	10/15	National Wildlife Federation	Andy Buchsbaum, Senior Great Lakes Manager	Proposed rules should be strengthened by requiring 90% mercury reduction by 2010 on all

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				significant sources, not just utilities, be more restrictive on trading and make the variance provision more restrictive. Includes a discussion on regional mercury impacts and control technology costs.
36	10/15	Wisconsin Electric / Wisconsin Gas	Kathleen J. Standen, Manager, Environmental Regulatory Advocacy	Alternative to proposed rules recommended that includes a mandatory 10% (five years) and 40% (ten years) utility mercury reduction requirement, a multi-emission reduction option and adoption of control requirements instead of offsets for new and modified sources. Includes comments on the proposed rules and draft environmental assessment.
37	10/15	ADA - Environmental Solutions	Michael D. Durham	Provides overview of the technological developments in mercury control for coal-fired utility boilers with a likely schedule for commercially available sorbent injection control. Provides several case histories on the application of new control technologies in the electrical utility industry.
38	10/15	Wausau-Mosinee Paper Corporation – Brokaw Mill	Robert P. Klenner, Environmental Manager	Opposed to state mercury regulations and supports working with EPA on a federal approach. Concerned that state only rule will increase their energy costs and provide little benefit to the environment.
39	10/15	Wausau-Mosinee Paper Corporation – Mosinee Mill	Jim Pauls, Manager of Environmental Services (similar letters from other Mosinee Mill officials)	Opposed to proposed rules because of suspected adverse impacts. Support a voluntary program for industrial boilers and the 10%/40% plan proposed by the utilities and supported by the PSC. Opposed to emission caps because they will restrict production capability.
40	10/15	AFL-CIO PACE Chapter 221	Jim Happli, Vice President Chapter 221 (Wausau-Mosinee Paper Corp. – Mosinee Mill)	Opposed to proposed rules because of suspected adverse impacts. Support a voluntary program for industrial boilers and the 10%/40% plan proposed by the utilities and supported by the PSC. Opposed to emission caps because they will restrict production capability.
41	10/15	AFL-CIO PACE Chapter 316	Jim Schantz, President Chapter 316 (Wausau-Mosinee Paper Corp. – Mosinee Mill)	Opposed to proposed rules because of suspected adverse impacts. Support a voluntary program for industrial boilers and the 10%/40% plan proposed by the utilities and

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42	10/15	Wausau-Mosinee Paper Corporation – Specialty Paper Group – Rhinelander Mill	Tim Hasbargen, Director of Engineering (similar letters from other Rhinelander Mill officials)	Opposed to proposed rules because of suspected adverse impacts. Support a voluntary program for industrial boilers and the 10%/40% plan proposed by the utilities and supported by the PSC. Opposed to emission caps because they will restrict production capability.
43	10/15	Bay Engineering Castings – De Pere	Michael Boatwright, Project Engineer	Opposed to proposed rules.
44	10/15	Basic American Foods – Plover	Paul Gover, Facilities Manager	Encourages WDNR not to develop a state rule and instead believes a national approach is appropriate.
45	10/15	Alliant Energy –Wisconsin Power & Light Company	Joseph E. Shefchek, Managing Director, Environmental Health & Safety	Support a reasonable first step for Wisconsin including a 10%/40% mercury reduction approach. Includes specific recommendations on revising major provisions of the proposed rules.
46	10/15	AFL-CIO PACE Local 15 - Rhinelander	Jim Kronberger, President	Support a voluntary program for industry and a 10%/40% mercury reduction approach for electric utilities.
47	10/15	Xcel Energy	John D. Wilson, Vice President – Public and Regulatory Affairs	Requests that the major stationary source definition in the proposed rules be examined because of the potential adverse impacts
48	10/15	Schneider National – Green Bay	Bob Geyer, Facility Maintenance Manager	Support a voluntary mercury reduction program due to the potential impacts of the proposed rules on reliability and energy costs.
49	10/15	Dane County Conservation League	Donald L. Hammes, Chairman, Habitat Committee	Support a 90% mercury emission reduction by 2010 without a trading provision.
50	10/15	Yahara Fishing Club, Inc.	Donald C. Hammes, Chairman, Habitat Committee	Support a 90% mercury emission reduction by 2010 without a trading provision.
51	10/15	Wisconsin’s Environmental Decade	Keith Reopelle and Marc Looze	Support a 90% mercury emission reduction by 2010.
52	10/15	The Izaak Walton League of America, Midwest Office	Sarah Welch	Support a 90% mercury emission reduction by 2010. Provides an overview of Minnesota’s voluntary mercury emission reduction program.
53	10/15	Stora Enso North America – Wisconsin Rapids	Annabeth Reitter, Division Air Program Manager	Opposed to proposed rules. More comments to be submitted by October 29 <sup>th</sup> .
54	10/15	Madison Physicians for Social Responsibility	Ann Behrmann, M.D. Pediatrician	Summary of mercury health impacts provided at the Madison public hearing on October 3 <sup>rd</sup> and supporting documents.

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55	10/16	ArvinMeritor – Oshkosh	Daniel L. Miller, Site Manager	Support a voluntary program. Concerned for potential increase in business costs and effect on electric reliability.
56	10/17	GranTek Inc.	Paul Dongieux, President	Support a voluntary mercury reduction program.
57	10/18	Oshkosh Chamber of Commerce	John A. Casper, President/CEO	Support a voluntary mercury reduction program.
58	10/26	Columbia County Sporting Alliance	Ray Barden, President	Support a 10%/40% mercury emission reduction approach for electric utilities.
59	10/29	Wisconsin Environmental Coalition of Labor and Industry	Erin T. Roth, Wisconsin Petroleum Council and Mike Pyne, IBEW Local 965	Support a 10%/40% mercury emission reduction approach, but not until federal MACT promulgated.
60	10/29	Wisconsin Manufacturers & Commerce	Jeffrey T. Schoepke, Director Environmental Policy	Opposed to the proposed rules due to four major concerns – cost to ratepayers, threat to meeting state energy needs, emission caps inhibit growth and environmental problem isn’t addressed.
61	10/29	Wisconsin Institute of Scrap Recycling Industries	Peter Peshek, DeWitt, Ross & Stevens	Two key issues with the proposed rules - the difficulty of accurately determining emissions from their operations and the desire to have baselines adjusted upward to account for past voluntary actions. Recommend that automobile scrap recyclers that apply good work practices be exempt from the proposed rules.
62	11/1	Madison Gas & Electric	Michael Ricciardi, Senior Director – Safety and Environmental Affairs	Support a 10%/40% mercury emission reduction approach and opposed to mercury emission caps.
63	11/2	Stora Enso North America – Wisconsin Rapids	Annabeth Reitter, Division Air Program Manager	Opposed to proposed rules. Provides additional comments not included in an earlier submittal.